

- c. Defendant's payment of the settlement funds within fifteen days of the approval by the Court.
4. The following deadlines from the existing Case Management Order remain pending:
 - i. Motions In Limine **December 26, 2019**
 - ii. Conference between counsel **January 11, 2020**
 - iii. Joint Statement of the Law Proposed Verdict Form **January 27, 2020**
 - iv. Final Pretrial Conference **January 31, 2020**
 - v. Requests to Instruct the Jury Proposed Voir Dire **February 3, 2020**
 - vi. Pretrial Memorandum **February 5, 2020**
 - vii. Trial briefs **February 5, 2020**
 - viii. Trial **February 10, 2020**
5. The parties agree that this Schedule should be vacated and all proceedings stayed until January 17, 2020 following the Defendant's School Board Meeting pending Plaintiff filing a Petition to Approve Settlement or certification that the settlement has not been approved by the School Board.
6. The issuance of a sixty day order is not appropriate at this time because such an order would expire (if entered today) on February 14m 2020. Based upon the current timeline, it is possible that settlement will not have been consummated in that timeframe.

WHEREFORE, the parties jointly request that the Court vacate the Trial Scheduling Order dated October 16, 2019, and issue an Order Staying All Proceedings

pending the filing of a Motion to Approve Settlement or certification the Settlement has not been approved by the Defendant's Board of Education.

Respectfully submitted,

HAHALIS & KOUNOUPIS, P.C.

MARSHALL DENNEHEY

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Date: December 16, 2019

CERTIFICATE OF SERVICE

I, David L. Deratzian, Esquire, hereby certify that on December 16, 2019 a copy of the Joint Motion to Modify the Scheduling Order upon the person(s) and in the manner indicated below:

ECF Filing: Christopher J. Conrad, Esquire
Attorney for Defendants

BY:/s/ David L. Deratzian

Date: December 16, 2019